



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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Ref: EPR-N

Stanley Putnam, BG, Commander
Montana Army National Guard
Fort Harrison
P.O. Box 4789
Helena, MT 59604-4789

Richard M. Hotaling, Field Manager
Butte Field Office
Bureau of Land Management
U. S. Department of the Interior
106 North Parkmont
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RE: Draft Legislative Environmental Impact Statement
Limestone Hills Training Area Land Withdrawal
CEQ# 20070300

Dear General Putnam and Mr. Hotaling:

This Draft Legislative Environmental Impact Statement (DEIS) has been prepared by the U.S. Department of the Army (DA) to withdraw 18,644 acres of federal lands within the Limestone Hills Training Area (LHTA) from Bureau of Land Management (BLM) administration. Land withdrawal appears to be the best option to the current situation where unexploded ordnance (UXO) has been released into the environment such that long-term exclusive use of the range is required to prevent public exposure to potentially lethal hazards. The preferred alternative would authorize the Army to accept transfer of administrative responsibility for all federal land within the LHTA from the Department of the Interior/BLM so that UXO clearance could occur and exclusive use for military training by the MTARNG could continue.

EPA finds that the DEIS is thorough and complete in its analysis of the impacts of the proposed action, alternative actions, and current adaptive management strategies. The document thoroughly addresses a number of foreseeable impacts including socioeconomic impacts to the local government for loss of tax revenues. In general, EPA's concerns with the DEIS are minor and center on how the MTARNG would carry out federal land management responsibilities now placed with BLM. There are also several instances we point out where the current language is unclear or insufficiently informative.

Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and its alternatives in an EIS, EPA rates this DEIS as LO-1 (Lack of Objections – Adequate). An “LO” signifies that EPA’s review of the DEIS has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. A “1” rating signifies that the LEIS adequately sets forth the environmental impacts of the preferred alternative and those of the alternatives reasonably available to the project; no further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Comments:

1. The DEIS states that existing grazing permit holders would continue grazing under their current leases and have the option to renew their permits for a 20-year period, longer than is currently allowed (page 4-13). We note that there may be a need to modify or revise grazing management at some point if grazing practices adversely affected soil, vegetation, or water resources within the LHTA. Although only one perennial stream, flows into the LHTA area, and surface flows in Indian Creek are lost outside the LHTA, grazing could adversely impact soils and riparian vegetation in the Indian Creek drainage. We recommend using a monitoring and adaptive management approach to assure that resource conditions on the LHTA and impacts from grazing are periodically evaluated, and modifications to grazing practices made in response to monitoring showing grazing practices that are causing resource degradation.
2. The DEIS states (page 4-29) that the fence around the high-explosive active impact area would not be constructed with the preferred alternative. If grazing is allowed on the LHTA and no fence is constructed around the high-explosive active impact area, it is not clear to us what means would be taken to assure that cattle and perhaps wildlife do not graze in areas of explosive use or areas with unexploded ordnance. We recommend that this potential impact to grazing cattle and wildlife be mitigated by construction of exclusion fencing discouraging this unintended consequence of allowing grazing allotments near the firing ranges.
3. The DEIS states that spotted knapweed is widely distributed in the LHTA (page 3-94), and other noxious weeds are noted to be present (e.g., Canada thistle, leafy spurge, Dalmatian toadflax, diffuse knapweed, common hound’s tongue, musk thistle, etc.). It is stated (pages 3-28, 3-30) that weed control activities will be performed primarily by MTARNG personnel as described in the MTARNG Pest Management Plan, and this includes spraying noxious weeds in high traffic areas of the closure area (such as near roadways and training facilities) in accordance with the LHTA Pest Management Plan (MTARNG 1998b) and BLM requirements. Herbicides, pesticides, and other toxicants and chemicals must be used in a safe manner in accordance with Federal label instructions and restrictions that allow protection and maintenance of water quality standards and ecological integrity, and avoid public health and safety problems.

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